

November 29, 2018

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Notice of ex parte presentation - Connect USVI Stage 2 Support
WC Docket No. 18-143*

Dear Ms. Dortch:

On November 27, 2018, ATN International, Inc. (“ATN”) met separately with Chairman Ajit Pai and Michael Carowitz and Preston Wise of his staff; Commissioner Brenden Carr and Jamie Susskind of his staff; Arielle Roth of the Office of Commissioner Michael O’Rielly and intern Kagen Despain; and Travis Litman of the Office of Commissioner Jessica Rosenworcel to discuss Connect USVI Fund Stage 2 support in connection with the above-referenced docket.¹ ATN was represented by Michael Prior, President and CEO; Douglas Minster, Vice President, Government and Regulatory Affairs; and outside counsel Bryan Tramont and the undersigned.

In the meeting, ATN thanked the Commission for all of its work in responding quickly and decisively to Hurricanes Irma and Maria. ATN also provided an update on Viya’s network restoration efforts. Viya has restored voice and broadband service to all locations that Viya served on its hybrid fiber-coaxial (“HFC”) network prior to the storms where there is still a customer or potential customer. ATN noted that it has spent over \$80 million on Viya’s hurricane restoration efforts, only a small portion of which was covered by the Stage 1 funding already issued by the Commission. ATN also discussed the importance of sufficient and stable universal service support in a territory such as the USVI where the costs of providing service are high and the economic conditions are challenging. ATN also discussed the need for certainty

¹ *The Uniendo a Puerto Rico Fund and the Connect USVI Fund, et al.*, WC Docket Nos. 18-143 *et al.*, Order and Notice of Proposed Rulemaking, FCC 18-57 (rel. May 29, 2018).

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regarding future support. ATN and Viya may have to defer decisions about further hardening and extension of its network pending resolution of this proceeding.

Consistent with its comments and reply comments in this proceeding, ATN explained that the most effective and expeditious way to bring the Stage 2 Connect USVI funding to bear to benefit the people of the USVI would be to provide the funding to Viya—the sole incumbent local exchange carrier charged with serving the USVI in its entirety as the carrier of last resort, and the sole operator of a Territory-wide wireline broadband network.² ATN also discussed the enormous differences between the USVI and Puerto Rico markets, which differences warrant different, tailored approaches to the allocation of Stage 2 support in each Territory.³

This letter is filed consistent with the Commission's ex parte rules.

Sincerely,

/s/

L. Charles Keller

cc: Hon. Ajit Pai
Hon. Brendan Carr
Michael Carowitz
Preston Wise
Arielle Roth
Jamie Susskind
Travis Litman
Kagen Despain

² See Comments of Virgin Islands Telephone Corp. dba Viya, WC Docket No. 18-143 (filed July 26, 2018); Reply Comments of Virgin Islands Telephone Corp. dba Viya, WC Docket No. 18-143 (filed Aug. 8, 2018).

³ *Id.*